

*Honorable Barbara J. Rothstein*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

FREDERICK and ANNALESA THOMAS;  
and JO-HANNA READ, as Guardian ad  
Litem of E.T., a minor,

Plaintiffs,

v.

JASON CANNON; BRIAN MARKERT;  
RYAN MICENKO; MICHAEL WILEY;  
MICHAEL ZARO; CITY OF FIFE; CITY  
OF LAKEWOOD; and PIERCE COUNTY  
METRO SWAT TEAM,

Defendants.

Nos. 3:15-cv-05346-BJR  
3:16-cv-05392  
CONSOLIDATED CASES

FULL SATISFACTION OF  
JUDGMENTS

FREDERICK and ANNALESA THOMAS,  
as Co-Administrators of the Estate of  
Leonard Thomas, and its statutory  
beneficiaries,

Plaintiffs,

v.

BRIAN MARKERT; MICHAEL WILEY;  
NATHAN VANCE; MICHAEL ZARO;  
SCOTT GREEN; JEFF RACKLEY; CITY  
OF FIFE; CITY OF LAKEWOOD; PIERCE  
COUNTY METRO SWAT TEAM; and  
JOHN DOES 1 through 10,

FULL SATISFACTION OF JUDGMENTS  
USDC WD WA NOS. 3:15-cv-05346-BJR and 3:16-cv-05392--1

SMITH GOODFRIEND, P.S.  
1619 8<sup>TH</sup> AVENUE NORTH  
SEATTLE, WASHINGTON 98109  
(206) 624-0974 FAX (206) 624-0809

1 Fredrick and Annalesa Thomas, individually, and as co-administrators of the  
 2 Estate of Leonard H. Thomas, and its statutory beneficiaries, and Jo-Hanna Read, as  
 3 Guardian ad Litem of E.T., a minor, plaintiffs and judgment creditors in this action,  
 4 through their undersigned attorneys of record, hereby acknowledge full satisfaction  
 5 of the judgments entered in this action against Michael Zaro, Michael Wiley, Brian  
 6 Markert, the City of Lakewood, and the City of Fife, defendants and judgment  
 7 debtors, in full, together with interest, attorney fees and expenses, through an agreed  
 8 disposition of up-front cash and future periodic payments. Said judgments were  
 9 entered in the U.S. District Court for the Western District of Washington under the  
 10 above-referenced cause number on July 18, 2017 (Dkt. 241), amended on January 12,  
 11 2018 (Dkt. 333), and revised on February 7, 2018 (Dkt. 356). The undersigned  
 12 plaintiffs and judgment creditors also hereby acknowledge satisfaction in full of the  
 13 district court's orders granting attorney fees, costs and expenses, both entered on  
 14 March 28, 2018 (Dkts. 374 and 375).

15 DATED this 29 day of October, 2018.

16 MACDONALD HOAGUE & DAYLESS

17 By:   
 18 Timothy R. Ford

19 Attorney of Record for Plaintiff and Judgment  
 20 Creditors Frederick and Annalesa Thomas, and Jo-  
 21 Hanna Read, as Guardian ad Litem of E.T.

22 CONNELLY LAW OFFICES, PLLC

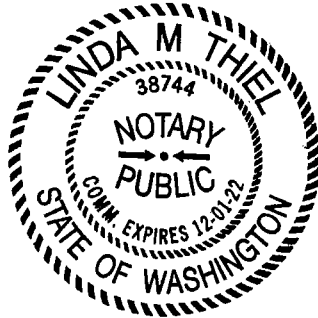
23 By:   
 24 John R. Connelly, Jr.

25 Attorney of Record for Plaintiffs Frederick Thomas  
 and Annalesa Thomas as Co-Administrators of the  
 Estate of Leonard Thomas, and its statutory  
 beneficiaries

1 STATE OF WASHINGTON )  
 2 ) ss.  
 3 COUNTY OF KING )

4 On this 29<sup>th</sup> day of October, 2018, before me, the undersigned, a Notary  
 5 Public in and for the State of Washington, duly commissioned and sworn, personally  
 6 appeared Timothy K. Ford, to me known to be, or having shown satisfactory  
 7 evidence of being, the individual described in and who executed the foregoing  
 8 instrument, to wit, the Full Satisfaction of Judgments in U.S. District Court for the  
 9 Western District of Washington Cause Nos. 3:15-cv-05346-BJR and 3:16-cv-05392,  
 10 and acknowledged to me that he signed and sealed the said instrument as his act and  
 11 deed for the uses and purposes therein mentioned.

12 WITNESS my hand and official seal hereto affixed the day and year in this  
 13 certificate above written.



14 Linda M. Thiel  
 15 NOTARY PUBLIC in and for the State of  
 16 Washington, residing at Des Moines  
 17 My appointment expires 12/01/2022  
 18 Printed Name: Linda M. Thiel

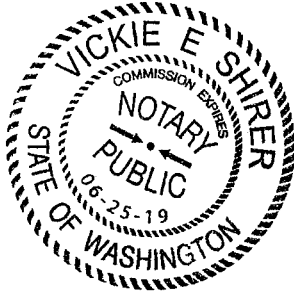
19  
 20  
 21  
 22  
 23  
 24  
 25  
 FULL SATISFACTION OF JUDGMENTS  
 USDC WD WA NOS. 3:15-cv-05346-BJR and 3:16-cv-05392--3

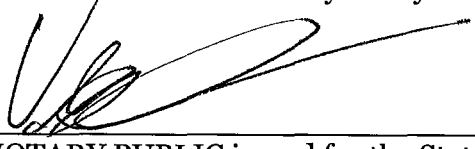
SMITH GOODFRIEND, P.S.  
 1619 8<sup>TH</sup> AVENUE NORTH  
 SEATTLE, WASHINGTON 98109  
 (206) 624-0974 FAX (206) 624-0809

1 STATE OF WASHINGTON )  
 2 ) ss.  
 3 COUNTY OF KING )

4 On this 29<sup>th</sup> day of October, 2018, before me, the undersigned, a Notary  
 5 Public in and for the State of Washington, duly commissioned and sworn, personally  
 6 appeared John R. Connelly, Jr., to me known to be, or having shown satisfactory  
 7 evidence of being, the individual described in and who executed the foregoing  
 instrument, to wit, the Full Satisfaction of Judgments in U.S. District Court for the  
 Western District of Washington Cause Nos. 3:15-cv-05346-BJR and 3:16-cv-05392,  
 and acknowledged to me that he signed and sealed the said instrument as his act and  
 deed for the uses and purposes therein mentioned.

8 WITNESS my hand and official seal hereto affixed the day and year in this  
 9 certificate above written.



10   
 11 NOTARY PUBLIC in and for the State of  
 12 Washington, residing at Tacoma  
 13 My appointment expires 6/25/2019  
 14 Printed Name: Vickie Shirer

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
 FULL SATISFACTION OF JUDGMENTS  
 USDC WD WA NOS. 3:15-cv-05346-BJR and 3:16-cv-05392--4

SMITH GOODFRIEND, P.S.  
 1619 8<sup>TH</sup> AVENUE NORTH  
 SEATTLE, WASHINGTON 98109  
 (206) 624-0974 FAX (206) 624-0809

**CERTIFICATE OF SERVICE**

I certify that on the 29<sup>th</sup> day of October, 2018, I filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following:

**Attorneys for All Defendants:**

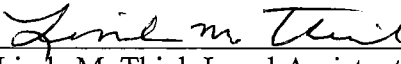
Howard Goodfriend [howard@washingtonappeals.com](mailto:howard@washingtonappeals.com)  
Catherine W. Smith [cate@washingtonappeals.com](mailto:cate@washingtonappeals.com)  
Ian C. Cairns [ian@washingtonappeals.com](mailto:ian@washingtonappeals.com)

**Attorneys for Plaintiffs (3:16-cv-05392 BJR):**

John Connelly [jconnelly@connelly-law.com](mailto:jconnelly@connelly-law.com)  
Meaghan Driscoll [mdriscoll@connelly-law.com](mailto:mdriscoll@connelly-law.com)

**Attorneys for Plaintiffs (3:15-cv-05346 BJR):**

Tim Ford [timf@mhb.com](mailto:timf@mhb.com)  
David Whedbee [davidw@mhb.com](mailto:davidw@mhb.com)  
Tiffany Cartwright [tiffanyc@mhb.com](mailto:tiffanyc@mhb.com)

  
Linda M. Thiel, Legal Assistant  
[lindamt@mhb.com](mailto:lindamt@mhb.com)